



FROM  
(NAME-LOCATION-PHONE) J. H. Craddock - G4NH (4-4764)

DATE	: March 17, 1983	cc.	C. F. Callis - B3CA
			W. D. Carpenter - G3WB
SUBJECT	: CORPORATE PCB INVENTORY/ <u>ANNUAL REPORT REVIEW</u>		J. R. Condray - G3WG
			R. L. Harness - C2NA
REFERENCE	:		F. E. Kearney - E2SA
			W. B. Papageorge - G4NH
TO	: See Distribution		P. S. Park - G3WB
			P. H. Smith - G3WB

It has been over a year since we evaluated the PCB inventory on a Corporate basis. In order to evaluate our progress in disposing of PCB material and items previously stored for disposal and/or in use, and to determine a new benchmark for our current inventory, please update your "annual document" for the preceding calendar year (through December 31, 1982) and forward a copy to me by May 1, 1983.

Remember this is not a report to be submitted to EPA. The "annual document" must be kept on site with PCB storage/use records and must be produced upon demand in an EPA PCB inspection for review.

(The Federal Regulations require updating of the "annual document" by July 1 for the preceding calendar year. I am requesting that you complete this updating by May 1. This will, in effect, allow you to complete the required document, thus complying with the regulation two months early and will save you the time, effort and manpower of having to perform the inventory twice in a short time period.)

In order to expedite this task, I am enclosing copies of the same forms and instructions used in our previous Corporate inventories performed in November, 1980, and March, 1982. Completion of these forms will provide you with the required summary documents for the 1982 calendar year "annual document." Keep one copy of the forms for the "annual document" and send another (xerox) copy to me.

In addition to the December 31, 1982, summary provided by this document, if you have made progress in disposing of material in the first few months of this year that significantly reduces your total, please indicate this as a footnote on my copy of the "annual document" summary. This will provide a factual summary to-date of our inventory.

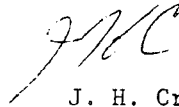
Also keep in mind that Federal Regulations require that all PCB materials and items placed in storage for disposal prior to January 1, 1983, be disposed of before January 1, 1984. Preparation of this year's "annual document" should enable you to readily plan for compliance with this disposal requirement. EPA has already re-increased its PCB site and records inspection program looking for violations of the PCB storage/records keeping rules.

See Distribution

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JHC  
3/17/83

If you have any questions, please phone me directly, 4-4764, St. Louis.



J. H. Craddock

/dg

Enclosure

Note: Since many changes in plant environmental managers have occurred since the last inventory, I am sending this request to all plant/site managers to ensure coverage of all sites. Please refer this request to the plant environmental manager responsible for PCB regulation compliance. Date for reply is May 1. Please inform me of any omissions or errors.